



United States Environmental Protection Agency  
One Congress Street, Suite 1100 (HBT)  
Boston, MA 02114-2023

October 23, 2000

Mr. John Mayhew  
DoN, Northern Division - NAVFAC  
10 Industrial Highway  
Code 1811/JM - Mail Stop 82  
Lester, PA 19113-2090

Re: Draft Study Area 16 (Creosote Dip Tank and Fire Fighting Training Area) Remedial Investigation Work Plan Addendum, dated September 2000, at the former Naval Construction Battalion Center (NCBC) Davisville, RI

Dear Mr. Mayhew:

Pursuant to § 7.6 of the Davisville Naval Construction Battalion Center Federal Facility Agreement dated March 23, 1992, as amended (FFA), the Environmental Protection Agency has reviewed the subject document and our comments are enclosed. As the Navy is the lead agency under CERCLA, the Navy has opted to start the investigations under the addendum prior to receipt of these comments. It is hoped that the BCT will be able to work through the enclosed comments in an expeditious manner so as to not impact the present schedule.

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine Williams".

Christine A.P. Williams  
Remedial Project Manager  
Federal Facilities Superfund Section

Enclosure

cc: Richard Gottlieb, RIDEM  
Walter Davis, CSO  
Bill Brandon, EPA  
Steve DiMattei, EPA  
Marilyn Cohen, ToNK  
Howard Cohen, RIEDC

Anne Heffron, Enviro-Tech  
Dinalyn Spears-Audette, Narragansett Tribe  
Eileen Cury, Gannett Fleming, Inc.  
Farooq Siddique, CDW Consultants, Inc.  
Jim Shultz, EA Engineering, Science and Technology

## **EPA Comments on the Draft WP Addendum for the RI of Site 16**

### **GENERAL COMMENTS**

1. A list of the references cited in the Work Plan Addendum is missing and should be added.
2. Appendix A - Several sections of the QAPP in this appendix reference the QAPP in Appendix A of the March 2000 work plan. For clarity, when referencing another document, each section needs to reference the appropriate pages, sections, and/or tables, and **not just reference the entire document/appendix**.
3. The Navy did not discuss Seismic locations with EPA until after the work had started. The Navy did not discuss addendum MIP locations with EPA at any time during the project. Comments on the locations are contained below.
4. In preparation for BCT discussion of the MIP locations, the Navy should have compiled and presented a comparison of MIP responses with probe collected groundwater samples. Provide comprehensive compilation of data, including the MIP/probe collected comparison, collected to date for discussion with the BCT on monitoring well locations at least 5 business days prior to the meeting date.
5. Provide a copy of the degreasing SOP found in Building 41 and any additional SOPs for similar operations in the Navy (such as at building 319 and the Creosote Dip Tank Area), in the revised work plan addendum. At interest is the transportation to the area, the staging of equipment/materials to be degreased or preserved, the degreasing and preserving activities themselves, staging for pick up, and transportation away from the area once the degreasing and preserving was done.

### **SPECIFIC COMMENTS**

1. **Section 2.6, Monitoring Wells and Soil Borings, Page 2-2.** This section states that shallow monitoring well MW16-04S could not be developed on 19 July 2000 (and subsequently slug tested) due to a blockage. The next sentence states that on 18 August 2000, the blockage was cleared. Therefore, the text should state that MW16-04S (and the wells to be re-installed - MW16-01S and MW16-05S) will be developed and slug tested.
2. **Section 3.2, Field Program, Page 1, Bullet #3 (Drilling and Installation of Monitoring Wells).** As noted in this section, two shallow wells will be installed to replace MW16-01S and MW16-05S which are dry. The proper abandonment of the dry

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wells should be included as part of the field work under this Work Plan Addendum. The procedures for well abandonment should be added to Section 4.

3. **Section 3.2, Field Program, Page 2, Bullet #5 (Sampling and Analysis).** It is stated that ground-water samples from the 25 new monitoring wells will be analyzed for TAL inorganics (filtered and unfiltered). This approach differs from the Work Plan (March 2000) which does not include the filtering of monitoring well ground-water samples. The rationale for this change (if not in error) should be provided. In addition, clarify whether the 14 monitoring wells to be sampled under the Work Plan (March 2000) will also be sampled for filtered and unfiltered inorganics. Corrections should be made to the Work Plan Addendum accordingly.
4. **Section 4.2, Seismic Refraction Profiling, Page 1.** Although the Navy points out that there were no objections to the seismic profiling as presented at the 9-14-00 meeting, the actual data presented on the hand-drawn map faxed to EPA on 10-13-00 suggests at least one area requiring further scrutiny. Current data suggests that structures beneath Building 41 may trend in the east and south east directions. These concerns are heightened in view of recent implications of Building 41 as a potential source area. The area directly east and southeast of Building 41, will require additional seismic coverage prior to additional groundwater explorations to chase the groundwater contamination indicated by MIP data recently received by EPA.
5. **Section 4.3, MIP Screening, Page 2.** This morning EPA received a hand drawn map with some MIP locations identified and some not identified. Please refer to the hand-drawn Top-Of Bedrock Map which has been annotated to refer to the following issues:
  - A,B,G; please explain the rationale for these MIP locations.
  - C; an additional MIP location is needed in this localized bedrock low (may be location W-01).
  - D; consider moving this location to the up-gradient side of the bedrock high.
  - E; consider adding an additional MIP Point in this broad area adjacent to building 41 with poor seismic control, (may be S-13).
  - F; consider adding a MIP location at this localized bedrock low, (may be S-17).
  - H; consider adding a MIP location at this broad area of low bedrock elevation down-gradient of the high VOC levels measured at MIP-16-17.

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- I, J, K, L; consider adding additional MIPs control along the eastern margin of the area of seismic control which generally indicates the lowest bedrock elevations across the site, as well as several semi-distinct localized lows.
6. **Section 4.3, MIP Screening.** In light of the most recent data received 10-23-00, additional work seems to be required south and east of building 41 to determine if a soil source area is located upgradient in amongst the railroad tracks or the buildings 319 and/or 318. EBS documentation indicates that preservation/degreasing operations similar to operations in building 41 took place in building 319.
  7. **Section 4.4, Drilling and Subsurface Soil Sampling, Pages 2 to 4.** The methodology for collecting soil samples for dioxin analysis should be provided in this section.
  8. **Section 4.4, Drilling and Subsurface Soil Sampling, Page 2, Paragraph 2.** This paragraph is incomplete (no modifications are provided) and should be completed.
  9. **Section 4.4, Drilling and Subsurface Soil Sampling, Page 2, Paragraph 3.** As a change from the Work Plan (March 2000), soil samples will not be collected from the deep monitoring well boring locations for laboratory analysis. Provide the rationale for this change. EPA believes soil samples should at least be collected at the proposed mid-screen level for comparison to groundwater contamination.
  10. **Section 4.4.2, Water Source, Page 3, Paragraph 1.** Clarify that the source water sample will be analyzed for the same parameters as the ground-water samples (as described in Section 4.4.2 of the Work Plan, March 2000).
  11. **Section 4.4.3.2, Bedrock Borehole Logging Requirements, Page 4, Paragraph 2.** This paragraph states that the open rock portions of the bedrock boreholes will be logged geophysically using tools such as caliper, single-point resistance, fluid temperature, heat-pulse flow meter, and acoustic televiewer (ATV). A similar suite of down-hole geophysical logging should be performed as was recently performed at the NIKE Site or justification as to why fluid conductive and /or EM conductivity will not be performed should be included in the Addendum. Standard Operating Procedures (SOPs) should be provide for each of these tools (similar to the SOP provided in Attachment 2 for Seismic Refraction Surveys).
  12. **Section 4.6, Monitoring Well Development and Bladder Pump Installation, Page 5.** This section does not discuss monitoring well development and bladder pump installation (i.e., this section must reference Section 4.6 of the Work Plan, March 2000, to be complete). Also, this section states that the bladder pump should be installed at least 1.5 feet above the bottom of the well to mitigate drawing in silt. It is recommended that the

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bladder pump be installed a minimum of 2 to 3 feet above the bottom of the well to minimize sediment mobilization, in accordance with Section 4.7.2.3 of the Work Plan, March 2000.

13. **Section 4.7.1, Storm-Water, Seep, and Sediment Sampling Procedures, Page 6.** The storm-water, seep, or sediment samples will be collected as part of the activities specified in the Work Plan (March 2000); therefore, it is not necessary to refer to these samples in the Work Plan Addendum.

14. **Section 4.7.2, Ground-Water Sampling, Page 6, Paragraph 1.** Section 3.2 of the Work Plan Addendum states that ground-water samples will be analyzed for both total (unfiltered) and dissolved (filtered) metals. If this statement is correct, then Section 4.7.2 should be modified to specify the procedures for filtering ground-water samples.

15. **Table 3-1, Summary of Sampling and Analytical Program, Page 1.** The following additions and corrections (in italics) to the table should be made:

TCL VOC	# of field samples = 25
TCL Pesticides/ <i>PCBs (8082)</i>	
Dioxin	Duplicate = 2, Rinsate = 3

In addition, the number of TAL inorganics samples will need to be corrected if both filtered and unfiltered samples will be collected. Table 8-1 in the Quality Assurance Project Plan (QAPP) should also be revised accordingly.

16. Table 8-1 - The total number of samples for dioxin analysis is listed as 23, but the samples in each of the columns only add up to 21 samples.
17. **Appendix A, Quality Assurance Project Plan Addendum.** Sections 8 through 11 state that the relevant information is provided in the Work Plan Addendum (and specific chapters are referenced). This information is generally not included in the Work Plan Addendum. Where appropriate, the relevant section(s) of the Work Plan (not the Work Plan Addendum) should be referenced, and the QAPP Addendum sections should be modified to include specific or additional quality assurance requirements as a result of the work to be conducted under the Work Plan Addendum.
18. **Appendix A, Quality Assurance Project Plan Addendum, Section 6., Project Description and Schedule.** The additional seismic refraction and MIP work should be added to this schedule.
19. **Appendix A, Quality Assurance Project Plan Addendum, Section 9, Sampling**

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**Procedures and Requirements.** This section must be modified to include the addition of dioxin analysis for soil samples. A modified Table 9-2 (from the original QAPP) must be included to show the required containers, preservation techniques, and holding times for dioxin samples/analysis.

20. **Appendix A, Quality Assurance Project Plan Addendum, Section 12, Fixed Laboratory Analytical Method Requirements.** A modified Table 12-2 (from the original QAPP) must be included to show the reporting limits for dioxin analysis. Also, discuss the dioxin reporting limit relative to the risk screening criteria that will be applied.
21. **Appendix A, Section 18, Verification and Validation Requirements, and Section 19, Verification and Validation Procedures.** These sections discuss ground-water samples only and must be modified to include the analysis of soil for dioxin.
22. **Appendix B, Site Safety, Health, and Emergency Response Plan Addendum (SSHERP).** The SSHERP must be modified to include the potential exposure to dioxin.
23. **Appendix B, Site Safety, Health, and Emergency Response Plan Addendum, Section 1, Site Information, Page 1.** The collection of seep and sediment samples from the shoreline of Allen Harbor should be removed from the list of Work Plan Field Activities (the Work Plan Addendum does not include the collection of seep and sediment samples).
24. **Appendix B, Site Safety, Health, and Emergency Response Plan Addendum, Figure 1.** Figure 1 is referenced in Section 4.2; however, it is missing and should be added to the SSHERP.
25. **Appendix B, Site Safety, Health, and Emergency Response Plan Addendum, Table 6-1, Site Worker Training and Physical Examination Record.** This table indicates that Dan Bishuk received his last HAZWOPER Annual Training on 3/91. This appears to be in error and should be corrected.